# Feedback Form

## Long-Term 2 RFP (Window 2) – October 14, 2026

### Feedback Provided by:

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Date: October 30, 2026

To promote transparency, feedback submitted will be posted on the Long-Term 2 RFP engagement page unless otherwise requested by the sender.

- ☐ **NO - There is confidential information, do not post**
- X☐ **YES - Comfortable to publish to the IESO web page**

Following the October 14th, Long-Term 2 RFP Window 2 engagement webinar, the Independent Electricity System Operator (IESO) is seeking feedback from stakeholders on the items discussed. The presentation and recording can be accessed from the Long-Term Procurement engagement webpage.

**Note:** The IESO will accept additional materials where it may be required to support your rationale provided below. When sending additional materials, please indicate if they are confidential.

**Please submit feedback to** engagement@ieso.ca **by October 30, 2026.**

## Rated Criteria

### Locational Criteria

- Do you have feedback on the proposed locational scoring framework, including the treatment of different zones, technology types, and repowering projects?
    - Locational points should be available to all generators, including repower projects. The bid evaluation should not discriminate against any one resource where the same electrons will be delivered to the grid at the same location regardless of whether the project is new build or repower.
    - In many or most cases "repowers" will be new builds at an existing connection point, after completion of the useful life of a previously committed generator.
    - This investment should not be penalized for previous generation coming to end-of-life after contributing to the province's energy needs for decades.
    - If repowers and new builds compete head-to-head for the same procurement target, deeming a project ineligible to obtain the same locational points that a new build could obtain, skews the competition, and creates unlevel/unfair competition mechanics for the procurement.
    - Excluding repowers from these points would require a separate procurement target (carve-out) for repowers to run a fair competition rather than create price separation within the evaluation.
    - If the goal of this repower exclusion is to incentivize new generation, then repowers should have a separate procurement target where proponents can bid on a level playing field.
    - **Enbridge recommends that the IESO remove the restriction on locational points for new builds only and run a level-playing field competition for LT 2 Window 2.**
    - Repowers are already subject to a cap that limits competition with new builds. A bid discount limited to new builds could substantially impact the selection of projects in the competition particularly on the award margin and subsequently bias procurement outcomes.
    - Repowers in many cases will be essentially new builds at an existing connection point. This investment should not be penalized for previous generation coming to end-of-life after contributing to the province's energy needs for decades.
    - This framework should not discourage building bigger, better, and more efficient generation investments, particularly for projects with existing community support from committed power producers. Excluding repowers from the bid price discount is working counter to efficient investment in the province's electricity infrastructure.

- **Enbridge recommends that if the IESO does not consider repowers eligible for locational points then the repower cap should transition to a repower MW target competing strictly with other repowers.**
- This target could still serve the IESO's ability to manage reliability. Further we also recommend the IESO remain open to staggering CODs for repowers should circumstances require that flexibility for any number of reasons, provided both parties consent.
- Feedback on competition dynamics has had a couple of turns for feedback, however the exclusion of eligible points for repowers fundamentally changes competition dynamics. This would apply a discount bid price for new projects over and above repowers.
- Despite an ability to repower on agricultural land or have deemed deliverability, there is no equivalent bid price discount for repowers. Many repowers will forego these advantages to build larger and more efficient power plants with more efficient investment of new capital in the province.

**Non-Wires Alternatives (NWA)**

- Do you have feedback on the proposed NWA opportunities, including eligibility, scoring, and the approach to assigning points?
  - NWAs provide a function and value to the transmission or distribution system. These types of projects typically receive regulated cost recovery for the benefit provided to the transmission or distribution system. The benefits of an NWA are typically compared to a wires option and when more economic the NWA proceeds. The NWAs are paid for the value of offsetting the costs of the wires solution and the value is typically assessed as the value of the wires solution deferral.
  - How will the IESO compensate a proponent for the transmission or distribution system value of a project and what is typically a regulated cost recovery stream?

**Agricultural Land Considerations**

- Do you have feedback on the proposed treatment of prime agricultural areas, agrivoltaics, and potential agricultural exemptions?

## LT2(e-2) Contract Design

**Non-Performance Charges (NPCs)**

- Do you have feedback on the proposed NPC changes, including technology-specific thresholds and the treatment of monthly production factors?

## Evolving Value of Energy Storage

- Do you have feedback on how the evolving reliability and capacity value of energy storage should be reflected in LT2 evaluation, scoring, or procurement design?
    - Be mindful of the changing resource value over time. How will the IESO solve for this short/medium-term metric when considering a 20-year contract value?
    - The IESO has not shared or reviewed modeling parameters in this brief engagement.
    - The timeframe is too short to implement capacity accreditation changes without drastically affecting development opportunities and the competitiveness of bids. This type of change should have full visibility and a transparent stakeholder process for a timeframe more representative of 6-12 months rather than 6-12 weeks.
    - Developers can adjust to rule changes and modifications where appropriate signals are in place, and details affecting the business case can be fully understood and modeled.
    - The IESO has not shared or discussed in this consultation any parameters related demand curve, or specific load forecast models that will inform the new methodology.

## Repowering

- Do you have feedback on the proposed Independent Engineer certification requirements?

- Do you have feedback on the proposed treatment of repowering projects within LT2 competition and evaluation processes?
    - Repowers need to be eligible for all points that new builds are eligible for otherwise competition and evaluation are skewed in favor of new builds. This is not a fair competition for the same product. Investments in repowers will be substantial.
    - This should not be disincentivized or disadvantaged in the competition.
    - If repowers do not have access to locational points, they are at a disadvantage.
    - Feedback on competition dynamics has had a couple of turns for feedback, however the new exclusion of eligible points for repowers fundamentally changes competition dynamics.
    - This would apply a discount bid price for new projects over and above repowers and will create bias at the margin of bid selection and a procurement bias against these new repower investments. This works counter to investments in more efficient technology at existing connection points and prevents these resources from competing on a level playing field.
    - Please see Locational Criteria section above for a more fulsome discussion and recommendations

## Regulation Service Readiness

- Do you have feedback on the proposal to require regulation-service readiness for LT2 projects?

- Do you have feedback on the proposed technical requirements and any associated cost, schedule, or implementation impacts?

## Deliverability and System Performance

- Do you have feedback on the proposed deliverability methodology, including regional congestion assumptions and transparency of information available to proponents?

- Do you have feedback on the proposed treatment of short-circuit strength, minimum system strength requirements, and emerging technologies such as grid-forming inverter-based resources?

- Do you have feedback on the proposed circuit availability maps and any additional information that would support project siting and proposal development?

## General Comments/Feedback

Do you have additional feedback to share with the IESO?